## REMARKS

Claims 1-6 were pending at the time of examination. Claim 1 has been amended. No new matter has been added. The Applicant respectfully requests reconsideration based on the foregoing amendments and these remarks.

### Claim Rejections – 35 U.S.C. § 102

Claims 1-6 remain rejected under 35 U.S.C § 102(e) as being anticipated by published U.S. Patent Application No. 2002/0040352 to McCormick (hereinafter "McCormick").

### *Summary of the invention*

The Applicant's invention pertains to providing a reliable transaction audit trail in an enterprise computer system. In general, a business to business (B2B) messenger is arranged to provide a reliable communication link between an e-business entity in the form of an enterprise computer system and an associated partner and/or any other associated enterprise computer system. The B2B messenger is coupled to a Java Message Service API (referred to as JMS) that provides an interface between the B2B messenger and the various business components included in the enterprise computer system. The B2B messenger can subscribe or "listen" to a Java Messenger Server (JMS) topic based upon an associated subscription rule. When the JMS topic points to a particular native message (referred to as a JMS message), a subscription manager included in the messenger receives the JMS message and directs a message adapter to modify the JMS message into a format consistent with a receiving partner based upon both the corresponding subscription rule and a corresponding document template, or B2B schema.

Once the JMS message has been converted, the JMS message is forwarded to the receiving partner, which returns a response message. A corresponding adapter located at the receiver's end ensure that the messages and responses are converted between the receiver's message format and the JMS message format. In this way, the e-business is able to communicate in a loosely coupled manner with the associated partner without the requirement of knowing what form the partner's portion of the B2B contract takes, and vice versa. By loosely coupling the two portions of the B2B contract, the inventive messenger provides for B2B integration

between businesses and their partners, that may or may not use the same message format internally.

In a particular embodiment, a business transaction audit trail of all B2B transactions is provided by an administrator coupled to the JMS. For each JMS topic that is being used to send or receive B2B messages to or from an external partner system, the JMS sends a copy of the B2B message to the administrator, whether or not the administrator is running. In those cases where the administrator is running, the B2B messages are stored in the administrator whereas if the administrator is not running, the JMS will store the B2B message. When the administrator is subsequently started, all B2B messages sent or received during the period of time that the administrator was not running are sent to the administrator by the JMS. A message monitor coupled to the administrator can then be used to display any of the B2B messages as desired.

A reliable audit trail can therefore be provided for all B2B transactions that have been either sent to or received from the B2B messenger, in addition to its abilities to overcome the problems related to the current lack of common standards (such as API and transport protocols, schemas, etc.), requirement for reliable B2B coupling, and the need for asynchronous communications when a particular partner is not responding or has non-congruous operating hours.

***McCormick does not teach an administrator in accordance with the invention***

Claim 1 is specifically directed to memorializing an e-business trail. In the second step of claim 1, it is determined whether an administrator (as defined above) is running. Depending on the outcome of this determination, various actions are taken, as explained in steps 3 through 6 of claim 1:

"if the administrator is running, storing the message in a corresponding topic in the administrator;

if the administrator is not running, storing the message by the message service;

if the administrator is running, storing a response to the sent message in the topic in the administrator corresponding to the sent message;

if the administrator is not running, storing the response by the message service;".

Finally, claim 1 specifies "creating an audit trail by retrieving the stored sent message and the corresponding response;" that is, the message and response are retrieved from their respective storage locations, which may be either the message service, or the topic in the administrator, depending on whether the administrator was running or not when the message/response were sent.

McCormick is directed to an electronic commerce network that facilitates the exchange of goods and services. The physical components of the system include a wide area network, a message bus, data channels and system connectors. The logical components of the system include system software, client application software, databases and an event coordinator/workflow processor. Functions of the McCormick system include business network registration, user registration, definition of roles, assignment of roles to business networks and user registrants, definition of logical products, definition of physical products, identification of the goods needed by a participant, identification of the goods offered by a participant and the brokering of a solution that takes into account the needs of one participant and the offer of another participant (McCormick, Abstract).

The Examiner alleges that paragraph [0127] of McCormick shows the step of "if the message is to be sent, determining if an administrator is running;". The Applicant respectfully disagrees. As was discussed in the summary section above, the administrator in the Applicant's invention is configured to receive copies of B2B messages for each JMS topic that is being used to send or receive B2B messages to or from an external partner system, whether or not the administrator is running. When the administrator is running, the B2B messages are stored in the administrator. When the administrator is not running, the JMS stores the B2B messages and sends them to the administrator when the administrator is subsequently started. A message monitor coupled to the administrator can then be used to display any of the B2B messages as desired.

In contrast, the "administrator" discussed in paragraph [0127] of McCormick, is "a User 2055 that has special privileges. An Administrator 2060 can execute processes that are not available to a normal User 2055 (e.g., an Administrator 2060 can update profile information for their Enterprise)." The User 2055 is "a generic role that represents an individual that is registered to the network" and "when industry-specific roles are not defined for the individual Users...the User 2055 role will be used exclusively for individuals" (McCormick, paragraph [0126]).

It ought to be evident from the above descriptions of the Applicant's administrator component and the "administrator" user in McCormick that the two are quite different, both in terms of the tasks they perform, and in terms of their embodiments. It is also evident that the cited part of McCormick does not show the act of "determining if an administrator is running," regardless of how the administrator is defined. Nevertheless, in an effort to avoid any remaining confusion about the Applicants administrator component and McCormick's "administrator" user, the Applicant has amended claim 1 to clearly state that the administrator is coupled to the message service.

Turning now to the next step of claim 1, "if the administrator is running, storing the message in a corresponding topic in the administrator," it is clear that the "administrator" in McCormick does not have any topic or other capabilities for storing messages, since the "administrator" is a "User 2055" role, as was discussed above. In rejecting this step, the Examiner refers to McCormick paragraph [0234], which states "The client application processes the reference data maintenance event. This may include storing the reply, displaying it or performing further processing on the reply event." McCormick describes the action of a client application – not an administrator as defined in the Applicant's invention (or in McCormick) – and whereas McCormick recites the word "storing," McCormick certainly does not mention storing "in a corresponding topic in the administrator," as required by claim 1.

The next step of claim 1 requires "if the administrator is not running, storing the message by the message service." This, the Examiner alleges, is shown in McCormick paragraph [0038], which describes "several major types of activities" that can be performed by the participants in the BVN™ system. The participants are defined in McCormick paragraph [0036] as enterprises or individuals, that is, the message service of the invention cannot be a "participant" in the sense that is disclosed in McCormick. Furthermore, the representative activities listed by the Examiner in the office action are "listening in an retrieving broadcast messages; participating in inter-party messaging; retrieving messages no longer available on broadcast." Regardless of what system component performs these activities, the Applicant would appreciate if the Examiner please could provide further explanation as to how any of these activities disclose "storing the message by the message service," as required by claim 1.

Claim 1 further specifies that "if the administrator is running, storing a response to the sent message in the topic in the administrator corresponding to the sent message." That is, the response is stored in the same topic as the original message. In rejecting this step, the Examiner cites the one-sentence paragraph [0966] of McCormick, which simply states: "All 'actual'

Events are created based on their corresponding Event Specification (i.e., 'template' Events)." The Applicant respectfully submits that creating an event, based on an event specification or template (or based on anything else for that matter), is not identical to storing a response in a topic in an administrator. At the very least, the Applicant respectfully requests that the Examiner provide an explanation as to how these actions can be considered to be identical, and as to how two completely different sections of McCormick allegedly can show storing a message and storing a response, respectively, and how they read on the administrator of the Applicant's invention.

The next step of claim 1 requires that "if the administrator is not running, storing the response by the message service." This step is rejected using McCormick paragraph [0038] under the same rationale that was set forth above for "storing the message," and is therefore not anticipated for at least the same reasons. The Examiner also refers to McCormick paragraph [0076], which is a brief description of FIG. 16 of McCormick and "illustrates the Process Responsibilities associated with components of the BVNM system Interoperation Framework 5000 architecture." Respectfully, neither of these paragraphs disclose "storing the response by the message service," as required by claim 1.

Lastly, the Examiner alleges that paragraph [0966] of McCormick also shows the last step of "creating an audit trail by retrieving the stored sent message and the corresponding response," in addition to the step discussed above. Again the Applicant respectfully disagrees, and contends that creating an event based on an event specification or template, is not identical to creating an audit trail by retrieving a sent message and a corresponding response. At the very least the Applicant would respectfully request an explanation from the Examiner of how the brief paragraph [0966] of McCormick can anticipate both the steps discussed above. For at least these reasons, claim 1 is neither anticipated by, nor obvious in view of the cited prior art and should be withdrawn.

Claims 2-6 all depend from claim 1 and the rejection of these claims is unsupported by the art for at least the reasons discussed above with respect to claim 1, and should be withdrawn.

**Conclusion**

The Applicant believes that all the rejections in the office action are now moot, and respectfully requests a Notice of Allowance for this application from the Examiner. Should the

Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Applicants hereby petition for an extension of time which may be required to maintain the pendency of this case, and any required fee for such extension or any further fee required in connection with the filing of this Amendment is to be charged to Deposit Account No. 50-0388 (Order No. SUN1P253).

Respectfully submitted,

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